

1 VICKI H. YOUNG
Law Offices of Vicki H. Young
2 706 Cowper Street, Suite 205
Palo Alto, California 94301
3 Telephone (415) 421-4347
4 Counsel for Salvador Rangel
5

6
7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
9

10 UNITED STATES OF AMERICA,) No. CR 08-00775-JF
11)
Plaintiff,) STIPULATION RE CONTINUANCE
12) OF STATUS DATE; ~~PROPOSED~~
v.) ORDER
13)
SALVADOR RANGEL,)
14)
Defendant.)
15 _____)

16 It is hereby stipulated between the defendant Salvador Rangel, by and through his attorney of
17 record VICKI H. YOUNG, and the government, through Assistant United States Attorney Jeffrey B.
18 Schenk, that the status date of February 4, 2009, at 9:00 a.m. be continued to March 4, 2009, at 9:00
19 a.m. The reason for this continuance is that the defense counsel needs additional time for to prepare
20 the case and review the discovery. Under Title 18 U.S. C. §3161(h)(8)(B(iv), the continuance is
21 necessary to allow defense counsel the reasonable time necessary for effective preparation of the
22 defense taking into the account the exercise of due diligence.

23 ///

24 ///

25 STIPULATION RE CONTINUANCE;
26 [PROPOSED] ORDER

1 It is so stipulated.

2 Dated: January 30, 2009

Respectfully submitted,

3

4

5

/s/ Vicki H. Young
VICKI H. YOUNG, ESQ.
Attorney for Salvador Rangel

6

7

8 Dated: January 30, 2009

JOSEPH P. RUSSONIELLO
UNITED STATES ATTORNEY

9

10

11

/s/ Jeffrey B. Schenk
JEFFREY B. SCHENK
Assistant United States Attorney

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

STIPULATION RE CONTINUANCE;
[PROPOSED] ORDER

PROPOSED ORDER

GOOD CAUSE BEING SHOWN, the status appearance set for February 4, 2009, is continued to March 4, 2009. This Court finds that the period from February 4, 2009, through and including March 4, 2009, is excludable time under the Speedy Trial Act, 18 U.S.C. §3161(h). The basis for such exclusion is the defense counsel needs additional time for investigation and review of discovery.

Therefore the ends of justice served by such a continuance outweigh the best interest of the public and the defendants in a Speedy Trial within the meaning of Title 18 U.S.C §3161(h)(8)(A).

As required by 18 U.S.C §3161 (h)(8)(B(iv), this Court finds that the reason that the ends of justice outweigh the best interest of the public and the defendant in a speedy trial are the denial of the continuance would unreasonably deny the defendant reasonable time necessary for effective preparation of the pretrial motions and defense, taking into account the exercise of due diligence, and would deny the defendant continuity of counsel. 18 U.S.C. §3161(h)(8)(B)(iv).

DATED: 2/3/09


JEREMY FOGEL
UNITED STATES DISTRICT JUDGE